

PERMIT CHRONOLOGY

Knolls Solar Evaporation Ponds M/045/022

Amax Minerals
Magnesium Corporation of America
(Last Revised October 27, 1997)

March 25, 1987	Received Notice of Intention and Mining and Reclamation Plan from AMAX Magnesium Corporation (Amax) for the Knolls Solar Ponds. A draft Environmental Assessment dated March 13, 1987 prepared by BIO/West, Inc. which had been prepared for the Bureau of Land Management was attached to the MR-1 form.
April 29, 1987	Variance Request for Roads and Pads, Revegetation, Dams and Soils
April 29, 1987	BLM letter to DOGM stating Amax will submit a reclamation plan near the end of the project rather than at the beginning as is usually done. BLM is treating the project under a right-of-way. The BLM will require: 1) all buildings, foundations and utility poles will be removed; 2) the fabric liner from the reservoir cell will be removed; 3) the inlet canal from the West Pond will be completely filled; 4) all haul roads west of the USPCI road will be ripped, water barred and reseeded; 5) all disturbed areas having more than 5% vegetation cover prior to the project will be reseeded. Specific reclamation requirements for the dikes have not been determined at this time.
April 29, 1987	Technical Review of NOI & MRP sent to Amax with deficiencies noted. Reclamation bond estimate attached.
April 30, 1987	Notice of Intention and Mining and Reclamation Plan received by DOGM as response to DOGM April 29th review.
May 1, 1987	Public Notice of Tentative Approval prepared.
May 5, 1987	Notice of Tentative Approval letter sent to Amax, after reviewing April 30, 1987 deficiency response. DOGM needs: 1) \$1,737,900 (1992 dollars) reclamation surety, and 2) complete set of updated project drawings and maps. DOGM will forward the Notice of Tentative Approval to newspapers for 30-day public comment.

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May 5, 1987	Letters to newspapers with Notice of Tentative Approval attached - to be published no later than the 12th day of May, 1987.
May 26, 1987	Received Affidavit of Publication from Newspaper Agency Corporation (Salt Lake Tribune, Deseret News).
June 1, 1987	Memo to Board requesting approval of Form and Amount of Surety for Amax's Knolls Solar Pond Project. Executive summary, cost estimate, surety bond attached.
June 4, 1987	Letter received from Amax showing legal description of Knolls Evaporation Ponds Project.
July 10, 1987	Memo to file of site visit (photo attached) showing vastness of the proposed project area.
September 10, 1987	Letter to Amax stating Board approved on June 18, 1987 and final approval is hereby granted.
December 4, 1987	Request for 1987 Annual Report.
January 21, 1988	Received 1987 Annual Report.
May 26, 1988	Memo to file of site inspection made on May 19, 1988. Staff observed construction progressing on the Knolls Project. South dike adjacent to I-80 is nearing completion. Pond I is filling w/water and the associated pump station has been built. The Great Salt Lake Pumping Project will have to continue for an additional 1-1/2 years before Amax's Knolls Project will be economical.
October 1989	Article from "Pay Dirt" Magazine. Renco buys Amax Magnesium - second largest U.S. Producer.
November 9, 1989	Division letter to Magnesium Corp of America (Magcorp). The Division understands that Amax Magnesium Corporation has been acquired by Renmag Corporation which is owned by Renco Group Incorporated. A Permit Transfer form is sent to be completed to transfer the permitting and reclamation liability to the new owner (Renmag or Renco).
No Date	Newspaper article - "Problems Evaporating at Magcorp."
November 27, 1989	Magcorp met with Division for assistance in completing the Permit Transfer as described in November 9th letter. No documentation of the meeting was found.

December 13, 1989 Letter from Magcorp responding to DOGM November 9th letter. After completing transfer forms, Magcorp unable to get reclamation surety bond changed due to agreed conditions of the sale of the company. All parties involved in the sale of Amax agreed that all bonds would remain in effect because the sale was a stock purchase agreement (letter from Renco Group legal counsel attached, outlining conditions of sale - also Certificate of Authority documenting the name change from Amax Magnesium Corporation to Magnesium Corporation of America attached).

January 5, 1990 Letter requesting 1989 annual report.

January, 1990 ? Received 1989 Annual Report dated January 17, 1990 (no date stamp when received).

January 18, 1990 Letter responding to Magcorp's December 13, 1989 letter. The Division will not require a permit transfer and replacement surety.

April 2, 1990 Received fax copy of letter dated March 28, 1990 from Amax to Renco Group. Amax does not want to keep bonding in place. Amax is not in business of providing bonding for unrelated companies. Deadline of May 31, 1990 is given for Renmag to post it's own bond.

April 30, 1990 Letter from Magcorp reminding DOGM of meeting at Knolls on May 7th to reevaluate the bonding requirements. Magcorp is requesting that the three separate agencies consolidate bonds and is hoping the bond can be reduced as a result of recent reclamation performed by Magcorp.

May 16, 1990 Received copy of letter from Magcorp to Renco Group responding to their April 2nd letter. Magcorp is trying to have bonds in place by May 31, 1990 in order to release Amax's bond.

May 18, 1990 Division letter to Magcorp with transfer form, reclamation contract and surety bond forms. The Division is reevaluating surety amount based on May 5, 1990 site inspection. The Division will also meet on May 30th with Tooele County and BLM to discuss bond reduction and joint bonding requirements.

May 24, 1990 Received fax from Tooele County. Tooele County currently holds \$86,000 bond on Magcorp gravel pits. The two northern sites have been satisfactorily reclaimed; only one pit (Gray Back) is currently in use. A MOU should be prepared to include Tooele County on the \$27,000 bond that BLM will hold. Please include language to satisfy the requirements of the conditional use permit (copy attached). At that time Tooele County can release their current bond. Minutes of July 6, 1989 meeting attached.

June 1, 1990	Received letter from Magcorp regarding May 30th meeting to discuss replacement of Amax surety bonds. Requirements that must be met by the County, BLM and DOGM are summarized.
June 4, 1990	Speed letter to BLM forwarding information on the escrow agreements regarding Magcorp's Knolls site.
June 4, 1990	Memo to file. Site inspection performed May 7, 1990 with representatives from Magcorp, BLM, and Tooele County. The joint inspection was to examine the possibility of reducing the number of bonds and combine them into one bond held by a lead agency.
July 9, 1990	Received transfer form and reclamation contract from Amax Magnesium Corporation to Magnesium Corporation of America. The surety will be forthcoming.
July 9, 1990	Memo to Board - requesting Board concurrence on Permit Transfer, amount and form of replacement reclamation surety for Magcorp's Knolls Solar Evaporation Pond Project.
July 25, 1990	Received Magcorp's surety bond with Gulf Insurance Company in the amount of \$110,000.
July 26, 1990	Letter to Magcorp giving final approval of permit transfers and amount and form of replacement sureties for Knolls Solar Evaporation Pond and Rowley Processing Plant. Copies of all documents attached.
August 21, 1990	Division letter to CNA Insurance Companies. Board approved replacement surety from Magcorp. The Division hereby releases and returns the surety bond terminating Amax's reclamation liability for this project.
December 27, 1990	Request for 1990 annual report.
January 22, 1991	Received 1990 annual report; 206 million gallons of $MgCl_2$ brine mined. A canal was dug to connect P1 pump to P2 canal. The new canal is about 3 1/2 miles long, 30 feet wide and 8 feet deep. Excavated materials used for side walls.
January 13, 1992	Request for 1991 annual report.
March 16, 1992	Second Request for 1991 annual report.
March 20, 1992	Received 1991 annual report; 94.19 million gallons of $MgCl_2$ brine mined.

January 4, 1993	Request for 1992 annual report.
February 4, 1993	Received 1992 annual report; 226.79 million gallons of M_gCl_2 brine mined.
December 13, 1993	Request for 1993 annual report.
January 18, 1994	Received 1993 annual report; 71.74 million gallons of M_gCl_2 brine mined.
December 15, 1994	Request for 1994 annual report.
January 13, 1995	Received 1994 annual report; 74.0 million gallons of M_gCl_2 brine mined. Plan to mine approximately 100,000,000 gallons of brine from the Knolls Solar Ponds and an additional 50,000,000 gallons from the Stansbury Ponds.
December 13, 1995	Request for 1995 annual report.
January 26, 1996	Received 1995 annual report; 240 million gallons of M_gCl_2 brine mined. Plan to mine 60,000,000 gallons from Knolls and 120,000,000 from Stansbury.
December 10, 1996	Request for 1996 annual report.
January 27, 1997	Received 1996 annual report; 6.26×10^9 gallons mined. Plan to mine approximately the same volume in the upcoming year.

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